

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff

v.

A) \$11,676.72 in funds from bank account number XXX-XX345-1-1 in the name of Juan Carlos De La Rosa at Edward Jones Bank in Doral, FL;

CIVIL NO. 20-

B) \$11,714.02 in funds from bank account number XXX-XX346-1-0 in the name of Juan Carlos De La Rosa at Edward Jones Bank in Doral, FL.; and

C) \$7,563.47 in funds from bank account number XXXXXX14704 in the name of Juan Carlos De La Rosa, Inc., at Wells Fargo Bank in Doral, FL.

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, plaintiff, the United States of America, by and through its undersigned attorneys, W. Stephen Muldrow, United States Attorney for the District of Puerto Rico; Héctor E. Ramírez-Carbó, Assistant United States Attorney, Chief Civil Division, and Maritza González-Rivera, Assistant U.S. Attorney, brings this complaint and alleges as follows in accordance with

Supplemental Rule G(2) of the Federal Rules of Civil Procedure.

NATURE OF THE ACTION

1. This is a civil action in rem brought to enforce the provisions of Title 21, United States Code, Sections 841 and 881(a)(6); Title 18, United States Code, Sections 1343, 1349, 1956(a)(1) and (h), and 981(a)(1)(A).

THE DEFENDANT IN REM

2. The defendant property seized by law enforcement officers of the Federal Bureau of Investigation ("FBI") consist of:
 - a. \$11,676.72 in funds from bank account number XXX-XX345-1-1 in the name of Juan Carlos De La Rosa at Edward Jones Bank in Doral, FL;
 - b. \$11,714.02 in funds from bank account number XXX-XX346-1-0 in the name of Juan Carlos De La Rosa at Edward Jones Bank in Doral, FL.; and
 - c. \$7,563.47 in funds from bank account number XXXXXX14704 in the name of Juan Carlos De La Rosa, Inc., at Wells Fargo Bank in Doral, FL.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to Title 28 United States Code, Section 1345, over an action for forfeiture pursuant to Title 28, United States Code, Section, 1355; and over this particular action pursuant to of Title 21, United States Code, Sections 841 and 881(a)(6); Title 18, United States Code, Sections 1343, 1349, 1956(a)(1) and (h), and 981(a)(1)(A).
4. This Court has in rem jurisdiction over the defendant property pursuant to Title 28, United States Code, Section 1355(b)(1)(A), (acts and omissions giving rise to the forfeiture occurred in this district); and Section 1355(b)(1)(B), (the defendant is found in this district).

5. Venue is proper in this district pursuant to Title 28, United States Code, Section 1355(b)(1)(A) (acts and omissions giving rise to the forfeiture occurred in this district) and Section 1395 (the defendant is found in this district).

BASIS FOR FORFEITURE

6. This is a civil action in rem brought to enforce the provisions of Title 21, United States Code, Sections 841 (Unlawful acts) and 881(a)(6) (All moneys, negotiable, instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this chapter) and Title 18, United States Code, Sections 1343 – Wire Fraud, 1349 – Attempt and conspiracy, 1956 – Laundering of monetary instruments, 981– Civil forfeiture.

FACTS

7. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in the Title 28, United States Code, Section 1746 unsworn declaration of the Federal Bureau of Investigation (“FBI”), Special Agent Jamal Brown attached to this complaint.

CLAIM FOR RELIEF

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant property be issued; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property condemned and forfeited to the United States of America for disposition according to law; and that

the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 28th day of April, 2020.

W. STEPHEN MULDROW
United States Attorney

s/Héctor E. Ramírez-Carbó
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VERIFIED DECLARATION

I, Maritza González-Rivera, Assistant U.S. Attorney, for the District of Puerto Rico, declare under penalty of perjury as provided by Title 28, United States Code, Section 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Federal Bureau of Investigation ("FBI"); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 28th day of April, 2020.

s/ M. González
Maritza González-Rivera
Assistant U.S. Attorney

VERIFIED DECLARATION

I, Jamal Brown, Special Agent, FBI declare as provided by Title 28, United States Code, Section 1746, the following:

I have read the contents of the foregoing Complaint for Forfeiture in Rem and the attached unsworn declaration thereto, and I find the same to be true and correct to the best of my knowledge and belief. I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Juan, Puerto Rico, this 28 day of April, 2020.

Jamal Brown
Jamal Brown, Special Agent
Federal Bureau of Investigation ("FBI")